

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CARRIE L. SITES,
1055 Old Waynesboro Road
Fairfield, PA 17320,

Plaintiffs,

vs.

NRA GROUP LLC d/b/a
NATIONAL RECOVERY AGENCY
2491 Paxton Street
Harrisburg, PA 17111,

Defendant.

CIVIL ACTION

NO.

COMPLAINT

I. INTRODUCTION

1. This is an action for damages brought by a consumer pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 (“FDCPA”) and the Fair Credit Reporting Act, 15 U.S.C. § 1681 (“FCRA”). While attempting to collect medical debts, Defendant NRA Group LLC (“NRA”)—a debt collector—violated Plaintiff’s privacy by disclosing her private medical and financial information to a third party.

2. After acknowledging the improper disclosure, Defendant NRA agreed to pay for the medical debt and to request deletion of the debts from Plaintiff’s credit reports. Instead of doing this, Defendant furnished information to the credit bureaus indicating that medical debts totaling over \$3,500.00 were in collection.

3. When Plaintiff disputed the inaccurate credit information with the credit reporting agencies, both NRA and the credit reporting agencies Equifax verified the medical debt as accurate.

4. Defendant NRA’s conduct violates the FDCPA’s prohibition on debt collection communications with third parties and the FDCPA’s prohibition on communicating credit

information known to be false.

5. Defendant violated the FCRA's requirement to conduct a reasonable reinvestigation into disputed inaccuracies.

II. JURISDICTION

6. Jurisdiction arises under 15 U.S.C. § 1692k, actionable through 28 U.S.C. § 1331.

III. PARTIES

7. Plaintiff Carrie Sites is an adult individual who resides at the address captioned.

8. Defendant NRA Group LLC d/b/a National Recovery Agency ("NRA") is a limited liability company with a principal place of business as captioned.

9. On information and belief, NRA regularly engages in the collection of consumer debts in this District using the mails and telephone.

10. On information and belief, NRA regularly attempts to collect consumer debts to be due another, and/or acquires consumer debts for collection when allegedly in default.

11. Defendant is a "debt collector" as that term is contemplated in the FDCPA, 15 U.S.C. § 1692a(6).

IV. STATEMENT OF CLAIM

12. In January 2020, Plaintiff Carrie Sites and her daughter received medical treatment at Wellspan Health Waynesboro Hospital.

13. Plaintiff Sites never received a bill from the hospital in connection with the treatment.

14. Then, on or about July 29, 2020, Defendant NRA sent a debt collection communication concerning the hospital services and charges via email to Plaintiff's husband's ex-wife.

15. NRA's email prominently displayed that it was from "NATIONAL RECOVERY AGENCY," and it listed dates of service, account numbers, and the amounts of two "outstanding" medical debts allegedly owed.

16. Plaintiff Sites learned about the debt collection email and became irate about the invasion of privacy.

17. Defendant NRA acknowledged the improper disclosure of information concerning Plaintiff's medical debts, and blamed the disclosure on a third party Defendant hired to send verified collection emails to debtors.

18. In any event, Defendant NRA promised to send the credit bureaus a deletion request to have the accounts removed from Plaintiff's credit report. Defendant also agreed to pay for the two medical debts.

19. Despite Defendant NRA's promise, Defendant furnished information to the credit reporting agency Equifax (and perhaps others) indicating that the account was in collection, totaling over \$3,500.00.

20. As a result of Defendant's conduct, Plaintiff has suffered damages, including emotional distress, aggravation, worry, and embarrassment.

COUNT I - FAIR DEBT COLLECTION PRACTICES ACT
(CARRIE SITES V. NRA)

21. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

22. Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692c(c), by communicating with a third party in connection with the collection of a debt.

23. Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692e(8), by communicating credit information which is known or should be known to be false.

WHEREFORE, Plaintiff Carrie Sites demands judgment against Defendant NRA Group LLC for:

- (a) Damages;
- (b) Attorney's fees, interest and costs;
- (c) Such other and further relief as the Court shall deem just and proper.

COUNT II - FAIR CREDIT REPORTING ACT
(CARRIE SITES V. NRA)

24. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

25. Defendant violated the Fair Credit Reporting Act, 15 U.S.C. § 1681, by willfully and/or negligently failing to comply with the requirements imposed under 15 U.S.C. § 1681s-2(b), including the failure to fully and properly investigate Plaintiff's disputes and by failing to correctly report results of an accurate investigation to each of the credit reporting agencies.

26. Defendant has violated the Fair Credit Reporting Act by willfully and/or negligently failing to conduct a reasonable investigation of the consumer's dispute and by reporting false credit information about Plaintiff after being put on proper notice of the inaccuracy.

WHEREFORE, Plaintiff Carrie Sites demands judgment against Defendant NRA Group LLC for:

- (a) Damages;
- (b) Punitive damages;
- (b) Attorney's fees, interest and costs;
- (c) Such other and further relief as the Court shall deem just and proper.

V. **DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury as to all issues so triable.

Respectfully submitted:

Date: 12/21/2020

/s/ Jody Lopez-Jacobs
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